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December 1, 2005

Mr. Charles L. A. Terreni  
Chief Clerk/Administrator  
South Carolina Public Service Commission  
Synergy Business Park, The Saluda Building  
101 Executive Center Drive  
Columbia, South Carolina 29210


2005-349C

**Re: Proposed Revisions to Article 6 of the Regulations of the Public Service  
Commission of South Carolina**

Dear Mr. Terreni:

I am writing on behalf of the South Carolina Telephone Coalition ("SCTC") to provide comments on the Commission Staff's proposal with respect to revisions to Article 6 of the Commission's regulations. The SCTC participated in the development of and supports the proposed revisions and comments filed jointly on behalf of the South Carolina Telephone Association and the Office of Regulatory Staff on October 25, 2005, and we urge the Commission to consider making the additional revisions described therein.

In addition, as noted in the cover letter accompanying the joint proposed revisions, the SCTC reserved the right to argue that an additional revision may be needed with respect to R. 103-612(1). We respectfully request that the Commission consider requiring that the annual reports filed by telephone utilities in South Carolina be standardized. While we recognize that additional information may be needed from the telephone utilities for specific purposes (e.g., rate of return regulation), we believe that information can and should be obtained through the audit and inspection process, and that the publicly-filed annual reports for all telephone utilities should be uniform.

Thank you for your consideration. Please clock in a copy of this letter and return it in  the enclosed stamped envelope.

Very truly yours,

  
M. John Bowen, Jr.

MJB,Jr./rwm

